



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

Ref: 8HWM-FF

MAR 25 1994

Mr. Richard Schassburger
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

RE: OU 1 Final Phase III RFI/RI Report

Dear Mr. Schassburger:

This is in response to DOE's letter dated March 18, 1994 and is also to summarize our meeting on March 21, 1994, both of which addressed the issue of manganese and antimony concentrations in groundwater at Operable Unit 1. Your letter implies that by EPA's request to include these two metals in the risk assessment, the agency was "arbitrarily deviating from the approved process with no clear technical justification". Our request was not arbitrary and it included clear technical justification: 1) both metals are present in groundwater at OU 1 at levels that exceed background and 2) both metals are present at levels that exceed health based drinking water levels. In addition, EPA's specific comment #51 points out that the report incorrectly states that antimony is not present at elevated levels in colluvial groundwater. This erroneous information was used as the primary rationale on page D-12 of the report to eliminate antimony as a contaminant of groundwater. The only rationale for eliminating manganese as a contaminant of groundwater was that it had a "low frequency of UTL exceedances combined with the absence of any defined plume". This is at best, weak technical justification for elimination.

Therefore, DOE needs to provide better technical justification for elimination of these metals as contaminants in groundwater. At our meeting on March 21, DOE's contractors suggested further rationale to support the determination that these are not contaminants at OU 1. These rationales were not fully developed at the time of the meeting and some were clearly not applicable to groundwater in the upper hydrostratigraphic unit, such as faulting and fractures in bedrock. DOE stated that it will further develop its rationale and provide good technical basis for such in Appendix D of the revised report. DOE agreed to provide this rationale to EPA for review prior to finalizing the report.

It was also agreed in this meeting that DOE would calculate the risks posed by manganese and antimony in groundwater for a residential exposure scenario that includes ingestion of the groundwater. These risks will be presented in the uncertainty

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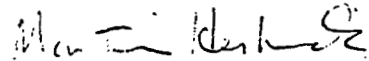


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analysis portion of the baseline risk assessment, along with a discussion of the possible consequences of the exclusion of these chemicals on the risk assessment. In addition, DOE stated that the main body of the risk assessment will reference the rationale for elimination found in Appendix D and a discussion of manganese and antimony will be included in the summary of the risk assessment.

If you have any questions concerning these matters or disagree with any of the agreements as stated above, please contact Gary Kleeman of my staff at 294-1071 as soon as possible.

Sincerely,



Martin Hestmark, Manager
Rocky Flats Project

cc: Scott Grace, DOE
Zeke Houk, EG&G
Jeff Swanson, CDH
Tim Reeves, Aguirre